

Exhibit B

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

January 11, 2022

Mr. John Drum
C/O Ms. Nina Marino, Esq.
Analysis Group
1900 16th St., Suite 1100
Denver, CO 80202

RE: United States v. Michael Avenatti
19 Cr. 374 (JMF)

Dear Mr. Drum,

Federal Defenders of New York, Inc., represents the above captioned individual in federal court in the Southern District of New York. Attached please find a trial appearance subpoena for your testimony on January 24, 2022, at 40 Foley Square in front of Judge Jesse M. Furman at 9:00 a.m. and for the duration of the trial. In addition to your trial testimony, we are requesting items be **produced in advance** of the January 24, 2022, trial date. Please see the enclosed subpoena rider with the requested items.

The requested items should be returned to Federal Defenders of New York, Inc., Attn: Ms. Anna Finkel, 52 Duane St., 10th Fl., New York, NY, 10007 or by email to anna_finkel@fd.org. You will not be required to be in court on January 24, 2022, but you will need to be available for the duration of the trial. Please contact me at (212) 417-8714 or Mr. Andrew Dalack, Esq., at (646) 315-1527 to discuss scheduling matters and your travel arrangements to testify at trial.

Sincerely,

/s/
Anna Finkel
Chief Investigator
(212) 417-8714

Enclosure

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America)

v.)

Michael Avenatti) Case No. 19 Cr. 374 (JMF)

Defendant)

SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: Analysis Group
C/O John Drum

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place of Appearance: 40 Foley Square, Judge Jesse M. Furman	Courtroom No.: courtroom 1105
	Date and Time: 01/24/2022 9:00 AM and for the duration of trial

You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

SEE RIDER

(SEAL)

RUBY J. KRAJICK

CLERK OF COURT



Signature of Clerk or Deputy Clerk

Date: 01/07/2022

The name, address, e-mail, and telephone number of the attorney representing (*name of party*) Michael Avenatti
, who requests this subpoena, are:

Federal Defenders of New York, Inc.
Mr. Robert M. Baum, Esq.
52 Duane St., 10th Fl.
New York, NY 10007
(212) 417-8760
Robert_Baum@fd.org

Case No. 19 Cr. 374 (JMF)

PROOF OF SERVICE

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

John Drum– Rider

Provide the following records:

**** Produce in advance of trial **certified copies** of the following items:**

Produce all communications relating to, in whole or in part, the finances of Michael Avenatti, Avenatti and Associates, APC, and/or Eagan Avenatti, LLP during the time period January 1, 2018 to May 15, 2019. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram, sent by or to John Drum, Evan Carter, Stacey Chan, Ryan Keithahn, Luke Wilder, or Christopher Borek.

Produce all slides, charts, presentations, decks, summaries, narratives, and exhibits relating to, in whole or in part, the finances of Michael Avenatti, Avenatti and Associates, APC, and/or Eagan Avenatti, LLP during the time period January 1, 2018 to May 15, 2019.**

****The defendant is indigent and invokes Rule 17(b) F.R.CRIM. P, and as such is not responsible for records-related fees.****

From: [Nina Marino](#)
To: [Anna Finkel](#)
Cc: [Andrew Dalack](#)
Subject: RE: John Drum Subpoena
Date: Wednesday, January 12, 2022 9:55:22 AM

received

NINA MARINO



KAPLAN | MARINO

marino@kaplanmarino.com

1546 N. FAIRFAX AVENUE

LOS ANGELES | CA | 90046

310-557-0007 | FAX 310-861-1776

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From: Anna Finkel <Anna_Finkel@fd.org>
Sent: Tuesday, January 11, 2022 2:57 PM
To: Nina Marino <Marino@kaplanmarino.com>
Cc: Andrew Dalack <Andrew_Dalack@fd.org>
Subject: John Drum Subpoena

Good afternoon Ms. Marino,

Thank you for agreeing to accept service of our trial subpoena for Mr. Drum. Federal Defenders of New York, Inc., represents Mr. Michael Avenatti in his upcoming trial in the Southern District of New York. We are requesting documents from Mr. Drum and potentially seeking to call him as a witness at the trial.

Attached please find a subpoena, subpoena rider and cover letter. Mr. Dalack, one of Mr. Avenatti's lawyers is available to discuss the subpoena request with you at a time that's convenient for you.

Thank you,
Anna

Anna Finkel, Chief Investigator
Federal Defenders of New York, Inc.
52 Duane St., 10th Fl., New York, NY 10007
(212) 417-8714 (office)/(646) 599-1998 (cell)
(212) 571-0392 (fax)